EXECUTIVE SUMMARY

SOURCE DESCRIPTION:

Inoac Packaging Group operates a plastic cosmetic bottles production facility (primary SIC code 3085). The source produces plastic cosmetic bottles from plastic resins using an injection blow molding process. The source uses the injection blow molding machines to process plastic resins to produce the bottles. Silkscreen printing, hot stamping, and the spray coating processes are used to coat the bottles.

PUBLIC AND U.S. EPA REVIEW:

On June 21, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in the *Kentucky Standard* in Bardstown, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received
Comments were received from Smith Management Group on behalf of Inoac Packaging Group on July 7, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, record-keeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

Response to Comments

Comments on Inoac Packaging Group Draft Conditional Major Renewal Permit submitted by John T. Kelly, P.E. of Smith Management Group.

Permit Cover Page

1. The Source name is incorrect. The Source name should be changed from "INOAC Packaging Group ANY" to "INOAC Packaging Group."

Division's response: Comment acknowledged, error was corrected before draft was released.

2. The Source ID# is incorrect. The Source ID# should be changed from "21-170-00040" to "21-179-00040".

Division's response: Comment acknowledged, error was corrected before draft was released.

Conditional Major Permit
Page 3 of 17, Section B, 2. Emission Limitations, 2., **Compliance Demonstration Method**: The reference is incorrect. The reference should be changed from "Operating Limitations #2" to "Operating Limitations."

Division's response: Comment acknowledged, change made.

3. Page 3 of 17, Section B, 4. Specific Monitoring Requirements: Inoac and SMG suggest the sentences "The Permittee shall inspect filter(s) on a daily basis. Filters shall be replaced when determined to be ineffective (through visual observation)." should be replaced with the sentence "The permittee shall inspect the Pulse Paks weekly to determine that they are operating properly, and the cartridge filters will be replaced when they are determined to be ineffective."

   In the Permit Statement of Basis, Periodic Monitoring Section, (a), the Division has indicated "… that direct measurements of mass and opacity emissions will not be required, but some assurance that the filters are working properly will be needed." Inoac and SMG interpret this means the Division's intent is that some assurance that the "control device" is working properly.

   At Inoac, the mini-frosters are ducted to one of the two Pulse Paks, and will never be operated with out the Pulse Paks, and will never be operated without the Pulse Pak being in operation as well. Inoac and SMG believe documenting periodic inspections of the Pulse Paks should be sufficient to assure compliance with particulate emission standards. Therefore, it is suggested that more specific language should be included for the operation and maintenance of the Pulse Paks.

Division's response: Comment acknowledged, change made.

4. Page 4 of 17, Section B, 7. Specific Control Equipment Operating Conditions: Based on Comment 4, Inoac and SMG suggest that the sentence "Exhaust Filters shall be in place at all times when the mini-frosters are operating and shall be changed as often as needed to comply with the emissions limitations." should be replaced with "The Pulse Paks shall be operating at all times when the mini-frosters are operating and the cartridge filters will be replaced when they are determined to be ineffective."

Division's response: Comment acknowledged, change made.